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*Attorneys for Creditors,
Majesti Mai Bagorio, et al.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER BY BAUM HEDLUND ARISTEI
GOLDMAN CAMP FIRE VICTIMS
CLIENTS IN CREDITOR THERESA ANN
MCDONALD'S EMERGENCY PLEADING
IN REPLY RE: NEED FOR ESTIMATION
OF CLAIMS FROM JUDGE JAMES
DONATO, U.S. DISTRICT COURT FOR
THE NORTHERN DISTRICT OF
CALIFORNIA [Dkt. No. 7820] .**

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR**
2 **ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER**
3 **INTERESTED PARTIES:**

4 Claimants Majesti Mai Bagorio, Michelle Dawn Barker, Melissa Rae Barnard, and Sara
5 Joanne Bates, et al. (collectively, “Baum Hedlund Aristei Goldman Camp Fire Victims Clients”)
6 (listed fully in Appendix A), which include nearly 200 victims of the 2018 Camp Fire, hereby
7 join in Creditor Theresa Ann McDonald’s Emergency Pleading In Reply Re: Need For
8 Estimation Of Claims From Judge James Donato, U.S. District Court For The Northern District
9 Of California [Dkt. No. 7820].
10

11 In particular, the Baum Hedlund Aristei Goldman Camp Fire Victims Clients join the
12 Emergency Pleading’s objection as to (1) the court approving the \$13.5 billion estimate in a
13 vacuum, without access to how that estimate was calculated, and (2) allow the underlying
14 claimant damages data compiled by PG&E to remain confidential or not become part of the
15 public record. Confidentiality is contrary to the rights of public disclosure, and more specifically
16 the interests of the Camp Fire victims, as it involves the highest public interest: reshaping
17 public use of electricity in California and the Public Utilities Code and *fair compensation* of
18 victims of the fires criminally caused by PG&E.
19

20 The Baum Hedlund Aristei Goldman Camp Fire Victims Clients object to a
21 confidentiality clause that would hide the data sources of the \$13.5 billion settlement figure and
22 prevent the proper assessment of the fairness of the Trust Fund figure. “If PG&E is not required
23 to produce the records required by the U.S. District Court for the Northern District of California,
24 the public will never see the total amount of damages caused by those fires, and the public has a
25 right to know that information. It serves as a warning of what PG&E might do in the future. .
26
27
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1 .Putting the total damages figure on the public record has a potential impact of whether or not the
2 California legislature passes a law currently under consideration that provides for the takeover of
3 PG&E in the event its equipment causes another huge and deadly fire. [Emergency Pleading,
4 Dkt. 7820 at 5-6].

5
6 The Joint Statement asks the court to accept the \$13.5 billion figure at face value, in a
7 vacuum, without any analysis of how the figure was reached. Absent a calculation of total
8 damages involved, the court cannot properly determine whether \$13.5 billion plus the Assigned
9 Rights and Causes of Actions is an adequate amount to resolve the fire victims' claims. This
10 data must be provided to the court as fundamental information for its analysis, especially since
11 the Debtors and TCC stated the data was already compiled and analyzed by experts.

12
13 The total amount of damages caused by these fires must be calculated. It must be done to
14 (1) establish the amount for each claim that will be submitted to the Fire Victim Trustee for
15 payment, (2) allow the Trustee to calculate an allowed amount for each claim, and (3) allow the
16 Trustee to calculate any discount that will have to be applied to each allowed amount because of
17 the limited funds available.

18 The Joint Statement claims: "Because expert reports were due to be submitted in the
19 estimation proceedings one week after the settlement was reached, all of this data and analysis,
20 including the data on prior settlements, was well developed and available to the Parties during
21 their negotiation of the Aggregate Fire Victim Consideration."

22
23 The Emergency Pleading urged: "If the victims are required to do all the work necessary
24 to duplicate work PG&E states has already been done to come up with totals for their individual
25 claims, not only will they have to pay that expense and suffer an additional delay while the totals
26 are calculated, but also the results will be shielded by a confidentiality clause." [Dkt. 7820 at 5]
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1 **CONCLUSION**

2 For the foregoing reasons, the Baum Hedlund Aristei Goldman Camp Fire Victims
3 Clients urge that (1) Debtors be required to produce to the court the calculations used for the
4 \$13.5 billion estimate, and (2) file this data in the public record.
5

6 Dated: June 10, 2020

Respectfully submitted,

7 BAUM HEDLUND ARISTEI GOLDMAN

8 /S/ Ronald L.M. Goldman

9 By: _____

10 Ronald L.M. Goldman
11 Diane Marger Moore, *Pro Hac Vice*
12 Attorneys for Creditors,
13 Majesti Mai Bagorio, et al.
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EXHIBIT A

Balsiger, Justine
Barker, Michelle
Barnard, Melissa, David Barnard, Tristan Barnard, Aiden Barnard & Hunter Barnard
Bates, Sarah
Bird, Douglas, Kathy Bird, Devon Bird
Bird, Devon, Alexis Liles, Ayden Evans
Bird, Douglas, Kathy Bird
Bird, Douglas, Kathy Bird (Rental)
Bustamante, Rudy, Bustamante, Diego
Cameron, Denise
Chambers, Tom
Christian, Kathy
Costa, Lynn
Culley, Denise, Emmett Culley
Darrin, Daniel
Dechter, Lorraine (2 homes)
Dechter, Lorraine (Studio)
Deen, Janet

1	Delaney, Colleen, Struthers, John
2	Dobra, Susan, John Michael Sun
3	Ferreira Steve, Ghirardelli, Jill
4	Flores, Lisa (2 houses)
5	Garcia, Jerry , Sharon Garcia
6	Gilbertson, Regan, Wayne Wise, Chad Wise
7	Gottowski, Gary, Rebecca Gottowski (HOME)
8	Gottowski, Gary, Rebecca Gottowski
9	Griffin, Suzanne (Rental)
10	Griffin, Suzanne (Mobile)
11	Haber, Tom, Jeanne Haber (Home)
12	Haber, Tom, Jeanne Haber
13	Jolley, Joan, Jane Ann Balsiger
14	Jones, Norman
15	Joseph, Daniel
16	Kasza, Elizabeth
17	Kasza, Elizabeth J.
18	Koenig, David
19	Kunst, John, Vicki Kunst
20	Kunst, John, Vicki Kunst (Rental)
21	Kunst, John, Vicki Kunst
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1	Lawhun, Jolene, Mateo Lawhun, Alec Lawhun
2	Lawhun, Nicole, Steven Lawhun, Monica Mae Baggorio, Majesti Mai Bagorio, Yhana Mia
3	Quinones-Gallegos, David Astrup (Minors -Margarita & Mauricia)
4	Linda Gunn, Lucille Lawhun
5	Lazzarino, Mark, Stacy Lazzarino, (Minors - Trinity, Isabella and James Lazzarino)
6	
7	Lewis Kelly, Quigley, Michael (Home)
8	Lewis Kelly, Quigley, Michael (Rental)
9	Luce, David, Jeri Ann Luce
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11	Luce, Edward
12	Lundberg, David, Jerry Ann Lundberg
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14	Maria Madruga, Noah Madruga
15	Magalia Community Church
16	Matson, Kelly
17	McKinnon, Mark, WendyMcKinnon
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19	Menezova, Maria, Tonetti, Elena
20	Miller-George, Sandra, John Miller-George
21	Morch, Andreas, Joanne Morch
22	Moseley, Pamela
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24	Myers, Jean Marie, James Myers
25	Paradise Community Guild (Phelps-Zink)
26	Parker, Rosalie & Switzer Paul
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1	Petersen, Jennifer Ann, David Pendergast, Michael Petersen, Logan Pendergast, Porter
2	Petersen, Cheryl Pendergast, Wilbert Pendergast, Jr.
3	Phelps-Zink, David, LoriPhelps-Zink
4	Poe, William & Moraes, Maria (Lotus)
5	Quattlander, Karen, Walden, Michael
6	Renn, Carole Louise – (De Lis Mingo)
7	Rose, Jim
8	Schuttenberg, Mark, Tanya Shuttenberg
9	Smelser, Matthew, Alexander, Brandy
10	Stewart, Donald, Sara Stewart, Jessie Stewart (Minors Griffin & River)
11	Strange, Wendy
12	Thorn, Steven
13	Toci, William, Diana Toci
14	Turner, Meghan, Charles Turner (Minors- Wesley & Hudson)
15	Varlinsky, Ray, Love, Marianna
16	Ward, Nicholas –(Bainbridge, Robert, deceased)
17	Westrope, Anthony
18	Williams, Robert
19	Winterburn, Anthony, Alexandria Winterburn (Aria & Hayden)
20	Wonacott, Victoria
21	Yang, Zongmei
22	Bensel, Connie
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1	Sprague, Andy & Janelle Sprague - (Home)
2	Sprague, Andy & Janelle Sprague - (Business)
3	Sprague, Andy & Janelle Sprague - (Business Property)
4	Sprague, Andy & Janelle Sprague - (Business Property)
5	Sherman, Fay & Anne Sherman Home
6	Sherman, Fay & Anne Sherman Daughter lived there
7	Inoglia, Joseph & Arlene Inoglia Home
8	Inoglia, Joseph & Arlene Inoglia Home
9	Inoglia, Joseph & Arlene Inoglia Rental
10	Inoglia, Joseph & Arlene Inoglia Rental
11	Swiger, Jennifer – Home
12	Swiger, Jennifer Paradise Mini Storage (personal & Business items)
13	Swiger, Jennifer - Rented Suite
14	Costa, Andrew & Shannon Costa Minor- Josephine Costa
15	Boyd, Judith Thomas & Judith Boyd Family Living Trust
16	Vigo, Phillip, KarissaVigo (Adalina & Deklan) Minors
17	Vigo, Phillip, KarissaVigo (Adalina & Deklan) Minors
18	Sweiger, John (Work Shop)
19	David Ellis
20	Don Zink
21	Don Zink
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1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to the within cause. My business address is
3 Baum Hedlund Aristei Goldman, 10940 Wilshire Boulevard, 17th Floor, Los Angeles, California
4 90024. On this day, June 10, 2020, I served the following document(s) in the manner described
below:

5 **JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS**
6 **CLIENTS IN CREDITOR THERESA ANN MCDONALD'S EMERGENCY PLEADING IN**
7 **REPLY RE: NEED FOR ESTIMATION OF CLAIMS FROM JUDGE JAMES DONATO,**
8 **U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA [Dkt. No.**
9 **7820]**

10 **X** **VIA ECF:** I caused the aforementioned documents to be filed via the Electronic Case
11 Filing (ECF) system in the United States Bankruptcy Court for the Northern District of
12 California, on all parties registered for e-filing in Case Number Case No. 19-30088 (DM).
13 Counsel of record are required by the Court to be registered e-filers, and as such are
14 automatically e-served with a copy of the documents upon confirmation of e-filing.

15 I declare under penalty of perjury, under the laws of the United States of America, that the
16 foregoing is true and correct. Executed on June 10, 2020.

17 *Diane Marger Moore*
18 DIANE MARGER MOORE
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